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12
13 IN THE UNITED STATES DISTRICT COURT
14 FOR THE EASTERN DISTRICT OF CALIFORNIA

15 UNITED STATES OF AMERICA,) Case No. 2:21-cr-00184-TLN
16 Plaintiff,)
17 vs.) **STIPULATION AND ORDER TO
18 MAYORAL ET AL) CONTINUE STATUS CONFERENCE**
19 Defendant.)
20) Date: April 7, 2022
21) Time: 9:30 a.m.
22) Judge: Troy L. Nunley

23 IT IS HEREBY STIPULATED by and between Phillip A. Talbert, United States
24 Attorney through Alstyn Bennett and Cameron Desmond, Assistant United States Attorneys,
25 attorneys for Plaintiff, and Heather Williams, Federal Defender, through Assistant Federal
26 Defender Mia Crager attorneys for Adan Mayoral, and Shari Rusk, attorney for Jesus Luna, that
the status hearing be continued to June 9, 2022 and that the Court exclude time pursuant to the
Speedy Trial Act.

27 Defense counsel desire additional time to consult with their client, to review discovery, to
28 evaluate potential defenses, and to otherwise prepare for trial. Government counsel indicated
that she is about to disclose further discovery including several recordings, and defense counsel
will need time to review them and discuss with their clients.

27 Defense counsel believes that failure to grant the above-requested continuance would
28 deny her the reasonable time necessary for effective preparation, taking into account the exercise

1 of due diligence and the difficulties that the COVID-19 pandemic creates for effective client
2 preparation and consultation.

3 The government does not object to the continuance.

4 Based upon the foregoing, the parties agree time under the Speedy Trial Act should be
5 excluded from this order's date through and including June 9, 2022, as previously ordered,
6 pursuant to 18 U.S.C. §3161 (h)(7)(A) and (B)(iv)[reasonable time to prepare] and General
7 Order 479, Local Code T4 based upon continuity of counsel and defense preparation.

8 Dated: April 5, 2022

9 HEATHER E. WILLIAMS
Federal Defender

10
11 */s/ Mia Crager*
12 MIA CRAGER
13 Assistant Federal Defender
Attorney for Defendant
ADAN MAYORAL

14 Dated: April 5, 2022

15 */s/ Shari Rusk*
16 SHARI RUSK
17 Attorney for Defendant
JESUS LUNA

18 Dated: April 5, 2022

19 PHILLIP A. TALBERT
United States Attorney

20 */s/ Alstyn Bennett*
21 ALSTYN BENNETT
22 Assistant United States Attorney
Attorney for Plaintiff

ORDER

IT IS HEREBY ORDERED, the Court, having received, read, and considered the parties' stipulation, and good cause appearing therefrom, adopts the parties' stipulation in its entirety as its order. The Court specifically finds the failure to grant a continuance in this case would deny counsel reasonable time necessary for effective preparation, taking into account the exercise of due diligence. The Court finds the ends of justice are served by granting the requested continuance and outweigh the best interests of the public and defendant in a speedy trial.

The Court orders the time from the date the parties stipulated, up to and including June 9, 2022, shall be excluded from computation of time within which the trial of this case must be commenced under the Speedy Trial Act, pursuant to 18 U.S.C. § 3161(h)(7)(A) and(B)(iv) [reasonable time for counsel to prepare] and General Order 479, (Local Code T4). **It is further ordered** the April 7, 2022 status conference shall be continued until June 9, 2022, at 9:30 a.m.

Dated: April 5, 2022


Troy L. Nunley

Troy L. Nunley
United States District Judge